

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

CHEETAH OMNI LLC

Plaintiff,

vs.

ALCATEL-LUCENT USA, INC. ET AL.

Defendants.

U.S. Circuit Judge Timothy B. Dyk

Civil Action No. 6:11-cv-390

Jury Demanded

**DEFENDANTS TELLABS OPERATIONS, INC.'S, TELLABS INC.'S, AND
TELLABS NORTH AMERICA, INC.'S OBJECTIONS AND COUNTER-DESIGNATIONS TO
CHEETAH OMNI, LLC'S DEPOSITION DESIGNATIONS**

Please take notice that Defendants Tellabs Operations, Inc., Tellabs, Inc., and Tellabs North America, Inc. (collectively, “Tellabs”) hereby make the following objections and counter-designations to Plaintiff’s trial deposition designations filed on January 16, 2014. Tellabs reserves the right to amend its objections and deposition designations to respond to issues raised and/or resolved after the submission of this list. Tellabs also reserves the right to designate the depositions of any witnesses that Plaintiff removes from its Witness List identified as “will call” and/or “may call.” In making any designations, Tellabs is not in any way waiving any objections to the admissibility of any of Plaintiff’s designations.

Tellabs' Objection Key to Deposition Designations:

Abbreviation	Objection
AA	Asked and Answered
AFE	Assumes facts not in evidence
BS	Beyond the Scope of Rule 30(b)(6) designation
C	Compound
CT	Counsel Testifying
EO	Improper Expert Opinion
I	Can be used for impeachment purposes only
IAC/NE	Improper attorney commentary; Not Evidence
L	Leading
LC	Contains legal conclusion
LF	Lacks Foundation
LO	Improper Lay Opinion
ME	Misstates / Misquotes evidence
MS/MIL	Subject to Motion to Strike or Motion in Limine
NR	Non-Responsive
O	Contains inappropriate opinion
OS	Outside the scope of the deposition subpoena topics
S	Speculation
VA	Vague / Ambiguous
106	Incomplete; Completeness
402	Irrelevant; Relevance
403	Unduly prejudicial (FRE 403); Misleading / prejudicial / More Prejudicial than Probative (FRE 403); Confusion; Out of Context
602	Lacks Personal Knowledge
802	Hearsay
901	Authentication

Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:5	4:8		
4:22	4:23		
			5:5-13
5:14	5:15		
			5:16-18
5:19	5:22		
6:1	6:3		
6:16	6:16		
			7:2-8:3
8:4	8:7		
8:10	8:14		
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Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
9:1	9:5		
			11:8-18
11:19	11:23		
13:2	13:6		
			13:19-22
			13:25-14:3
			14:5-6
			14:9-17
			14:23-15:2
15:3	15:21		
			15:22-23
15:24	15:25		
16:1	16:13	C; LC	
			16:14-17
			16:21-17:2
18:18	18:20		
18:23	18:23		
19:11	19:22		
			25:1
			25:5
			25:7-9
24:9	24:25		
25:10	25:12		
25:15	25:16		
25:18	25:20	LC; VA	
25:25	25:25		
26:1	26:25	26:13-15; 403; VA	
27:1	27:4		
27:10	27:25		
28:1	28:4		
28:22	28:25	LC; 403; VA	
29:2	29:3	LC; 403; VA	
			29:5-7
			29:10
			29:12
29:13	29:16		
			29:17-21
29:22	29:25		
30:1	30:4		
31:1	31:4	LF; 403	
31:7	31:7	LF; 403	
31:9	31:10	S	

Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
31:14	31:25	31:14-16; S 31:23-25; VA; LC	
32:1	32:1	VA; LC	
32:4	32:4	VA; LC	
32:6	32:7	LC; VA	
32:10	32:10	LC; VA	
32:19	32:23		
33:1	33:2		
33:4	33:6	LC; VA	
33:9	33:9	LC; VA	
33:11	33:14	602; S	
33:17	33:17	602; S	
			33:19-34:23
			35:2
			39:9-12
			40:7-8
			40:12-14
			40:16-17
			40:20-21
42:22	42:25		
43:1	43:2		
			43:7-12
			43:22-44:1
45:1	45:23		
46:3	46:8		
47:6	47:16	47:13-16; LF; VA; 403	
47:20	47:25	LF; VA; 403	
48:1	48:1	LF; VA; 403	
			48:3-11
			48:15-18
48:20	48:23	VA; LC	
49:3	49:7	VA; LC	
49:9	49:14	49:12-14; LF; S	
49:18	49:20	LF; S	
49:22	49:25		
			50:1-10
50:11	50:17	50:15-17; VA; LC	
50:22	50:23	VA; LC	
51:17	51:21		
52:2	52:5		
			52:6-9

Renato Cavour (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
			52:13-18
			55:20-24
			56:5
			56:7-23
57:8	57:11		
57:15	57:17		

Jack Kelly, Ph.D. (March 28, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
7:25	7:25		
8:1	8:6	8:2-4 402	
8:25	8:25		
9:1	9:2		
9:16	9:18		
9:25	9:25		
10:1	10:8		
10:25	10:25		
11:1	11:23		
13:5	13:8		
13:10	13:13		
14:17	14:25	14:20-22; 14:24-25 402	
15:1	15:2	15:1 402	
15:10	15:25		
16:1	16:6		
17:7	17:11		
18:15	18:16		
18:21	18:23		
22:22	22:25		
23:3	23:5		
23:7	23:10		
23:14	23:17		
23:19	23:23		
23:25	23:25		
24:1	24:6		
24:22	24:22		
25:5	25:11	25:7 402	
25:13	25:14		
25:16	25:16		
25:19	25:23	25:21 402	
26:8	26:9		
26:12	26:14	26:13 402	
26:16	26:16		
26:18	26:21		
33:18	33:21	402	

Jack Kelly, Ph.D. (March 28, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
34:2	34:2	402	
34:4	34:5	402	
34:7	34:8	402	
34:10	34:10	402	
34:12	34:13	402	
34:15	34:16	402	
34:18	34:20	402	
34:22	34:22	402	
34:25	34:25	402	
35:1	35:7	402	
35:20	35:22	402	
39:6	39:25	39:25 402	
40:1	40:5		
40:23	40:25		
41:3	41:6		
41:8	41:10		
42:4	42:17		
51:1	51:9	51:3-9 CT, IAC/NE, ME, NR	
52:9	52:24	52:20 402	
53:11	53:16	53:12 402	
55:9	55:15		
55:18	55:19		
55:21	55:25		
56:1	56:4		
56:14	56:16		
56:19	56:19		
56:22	56:22		
57:16	57:19		
57:22	57:23		
58:9	58:12		
58:15	58:15		
58:17	58:25		
59:1	59:4		

Kenneth E. Noreen (March 15, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:21	4:23		
			5:9-14
6:2	6:13		
6:17	7:10		
11:6	11:11		
16:25	17:2		
23:13	23:15		
23:24	24:24		
25:11	25:13		
25:16	26:5		
			26:6-8
			29:7-21
31:25	32:2		
38:11	38:14		
38:20	38:24		
40:10	40:21		
40:24	40:25		
41:2	41:3		
41:6	41:8		
41:10	41:12		
41:15	41:22		
			42:10-12
			42:15-21
			45:9-18
			46:5-9
			48:20-21
			48:25-49:3
			49:5-7
50:9	50:10		
50:14	50:16		
50:18	50:20		
50:24	51:2		
			52:17-21
			52:23-53:12
			54:2-10
			54:25-55:7
73:21	74:10		
			74:11-15
			75:13-16
75:25	75:25		

Kenneth E. Noreen (March 15, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
76:7	76:8		
			76:10-77:10
			78:12-15
			78:23-25
86:6	86:7	106	
95:16	95:19	VA; 403	
96:15	99:1		
			99:2-19
			100:23-24
			101:6-11
			103:13-14
			103:19-104:1
104:4	104:7	VA; 403	
104:10	104:12		
104:14	104:17		
104:22	105:1		
105:16	105:23		
106:11	106:13		
106:17	106:23		
114:17	114:25		
115:10	115:24		
116:2	116:3		
116:5	116:8		
116:12	116:17		
117:3	117:5		
117:20	117:23		
118:1	118:6		
118:12	118:13		
118:19	118:21		
118:24	118:25		
119:2	119:3		
119:7	119:12		
120:4	120:7	LF; 602; BS	
120:12	121:1	LF; 602; BS	
121:3	121:4	LF; 602; BS; VA; 403	
121:9	121:18	LF; 602; BS; VA; 403	
121:20	121:21	LF; 602; BS; VA; 403	
122:2	122:2	LF; 602; BS; VA; 403	
122:4	122:4	LF; 602; BS; VA; 403	
122:7	122:8	LF; 602; BS; VA; 403	
			122:10-123:10

Kenneth E. Noreen (March 15, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
			126:6-15
127:15	128:17		128:18-19
			128:22
			128:24-129:1
			129:5-129:19
			130:10-131:3
			131:7-12
			131:23-132:4
			132:21-24
			134:3-16
150:20	150:23		
150:25	151:1		
151:5	151:7		
			152:3-10

Robert T. Risden, Jr. (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
4:21	4:23		
			5:3-11
5:12	6:9		
7:6	7:23	7:20-23 BS; 403	
			8:6-9
			9:10-17
			9:21-10:4
10:6	10:15		
10:24	11:6		
			11:15-24
11:25	12:15		
			17:15-19:3
19:4	19:6		
			19:7-13
19:14	20:25	20:23-25 AFE; 403	
21:3	21:4		
21:22	22:5		
22:9	22:9		
26:23	27:10		
27:13	27:16		
27:18	27:21		
			27:22-28:5
			28:8-9
28:11	28:13		
31:2	31:4	106; 403	
			31:5-14
31:15	32:1	106; 403	
32:9	32:10	403	
32:14	32:19	403	
32:21	33:9	32:21 – 33:4 403 33:5-9 AFE; S; VA	
33:13	33:13		
33:20	33:21		
33:23	34:2	AFE; S; VA; 403	
34:5	34:5	403	
34:7	34:16	34:7-16	

Robert T. Risden, Jr. (July 23, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
		403 34:10-12 LO; 402; 403	
34:19	34:19	403	
34:21	34:22	403	
34:25	34:25		
			37:14-25
39:16	40:20		
			41:6-17
42:9	43:4		
43:8	43:10		
43:12	43:21		
44:5	44:7	602; LF; BS	
44:11	44:12	602; LF; BS	*
44:14	44:14	602; LF; BS	
44:17	45:3	602; LF; BS	
45:5	45:9	AFE; BS; S; 602; 403	
45:13	45:21	AFE; BS; S; 602; 403	
			46:23-47:2
			47:21-25
			48:2-3
			48:6
			48:23-49:8
			49:19-24
			50:3-5
			50:7-51:7
			51:10-13

Thomas A. Strasser (October 30, 2013)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
7:7	7:10		
9:21	9:25		
10:1	10:5		
23:9	23:25	23:13 402	
24:2	24:2	402	
24:4	24:8		
40:1	40:9		
43:10	43:25	43:24-25 106	
44:1	44:5	106	
			44:6-7
			44:9-18
45:14	45:15		
45:17	45:18		
46:17	46:19		
46:22	46:25		
47:1	47:1		
47:4	47:7		
47:12	47:14		
47:16	47:18		
48:11	48:12		
48:15	48:17		
66:12	66:16		
66:18	66:22		

Yajun Wang (August 9, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
5:24	6:5		
10:10	10:13	901; IAC/NE; 402; 403	
14:3	14:16		
14:24	14:24		
21:10	21:18	901; LF	
			22:12-16
22:17	23:2		
			24:21 – 25:1
			25:11-19
28:23	29:5		
29:10	29:11		
29:13	29:17		
29:22	29:24		
30:15	30:17	S; VA	
30:21	30:22	S; VA	
			32:21-23
			33:7-19
			36:25 – 37:1
			37:9-14
			38:1-6
			39:3-6
39:12	39:22		
39:24	40:8		
			40:9-10
			40:15-21
			41:5-9
42:3:	42:13		
42:20	43:5		
			43:21-22
			44:11-12
			44:14-22
			47:3-5
			47:9-10
			47:19-22
			48:23 – 49:25
			50:5-11
			50:14-18
			52:21-25
53:9	53:14		
			53:15-20

Yajun Wang (August 9, 2012)			
Cheetah Designations		Tellabs	
Begin	End	Objections	Counter-Designations
			53:23-25
			54:7-11
			69:3-9
			70:1-7
83:17	85:12	402; 403; LF; 901	
85:16	85:18	402; 403; LF; 901	
88:3	88:6	OS; 402; 403; VA	
83 [sic] 88:11	83 [sic] 88:14	OS; 402; 403	
89:14	89:18	402; 403	
93:8	93:14	901	
			94:22-23
			94:25-95:7
96:9	96:11	OS; S; VA; 402; 403	
96:16	96:18	OS; S; VA; 402; 403	
97:10	97:13	OS; VA; 402; 403	
97:18	97:23	OS; VA; 402; 403	
98:1	98:3	OS; S; 402; 403	
98:8	98:10	OS; S; 402; 403	
98:12	98:13	OS; S; 402; 403	
98:18	98:19	OS; S; 402; 403	
98:21	98:21	OS; S; 402; 403	
98:23	98:24	OS; S; 402; 403	
99:2	99:2	OS; S; 402; 403	
99:4	99:5	OS; S; 402; 403	
99:23	99:25	OS; S; 402; 403	
100:2	100:5	OS; S; 402; 403	

Yajun Wang (September 12, 2013)			
Begin	End	Objections	Tellabs Counter- Designations
			5:21-6:18
			7:10-13
			7:17-8:3
			8:14-9:3
			9:15-18
			9:21-10:17
			12:16-21
			15:21-25
			16:13-15
			16:19-21
			17:12-15
			17:18-22
			27:10-19
			27:21-23
			31:8-22
			32:1-5
			34:4-12
			37:8-13
			40:5-24
			42:1
			42:9-14
			42:20-43:2
			43:4-8
			43:22-44:3
			45:23-46:6
			47:15-21
			47:25-48:3
			48:5-24
			50:2-51:2
			51:7-18
			51:21-23
			52:11-53:2
			53:6-10
			54:20-56:20
			57:3-8
			60:22-61:9
			62:7-10
			62:14-20
			63:18-22
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Yajun Wang (September 12, 2013)			
		Tellabs	
Begin	End	Objections	Counter-Designations
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			66:2-12
			67:9-22
			68:1-10
			70:15-71:11
			71:22-24
			72:3-6
			72:16-74:2
			74:11-19
			75:3-13
			77:21-78:25

Dated: January 27, 2014

/s/ Mark A. Dodd

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Tellabs Operations, Inc., and Tellabs North
America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3), on January 27, 2014.

/s/ Mark A. Dodd
